

FILED

Jun 11 2024

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

United States District Court
FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

ADEDEJI SHAMONDA

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 242 – Deprivation of Rights Under Color of Law (Two Counts)

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 11th day of

June 2024

Elaine K. Harding
Clerk

LB
Bail, \$ Summons

Hon. Laurel Beeler, Magistrate Judge

FILED

Jun 11 2024

Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

ISMAIL J. RAMSEY (CABN 189820)
 United States Attorney

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:24-cr-00319 CRB
Plaintiff,)	<u>VIOLATIONS:</u>
v.)	18 U.S.C. § 242 – Deprivation of Rights Under Color
)	of Law
ADEDEJI SHAMONDA,)	
Defendant.)	SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

General Allegations

At all times relevant to this Indictment:

1. The defendant Adedeji Shamonda was employed as an airport screener at the San Francisco International Airport (SFO).

2. Victim 1 and Victim 2 were passengers at SFO.

COUNT ONE: (18 U.S.C. § 242 – Deprivation of Rights Under Color of Law)

Paragraphs 1 and 2 of this Indictment are re-alleged and incorporated as though fully set forth herein.

On or about September 21, 2023, at SFO, in San Mateo County, California, within the Northern

INDICTMENT

District of California, the defendant,

ADEDEJI SHAMONDA,

while acting under color of law, willfully deprived Victim 1 of the rights, secured and protected by the Constitution and laws of the United States, to be free from unreasonable searches and seizures and to not be deprived of property without due process of law by a person acting under color of law. In so doing, Shamonda unlawfully stopped and restrained Victim 1, searched Victim 1's person and her belongings, and stole money from Victim 1.

All in violation of Title 18, United States Code, Section 242.

COUNT TWO: (18 U.S.C. § 242 – Deprivation of Rights Under Color of Law)

Paragraphs 1 and 2 of this Indictment are re-alleged and incorporated as though fully set forth herein.

On or about September 21, 2023, at SFO, in San Mateo County, California, within the Northern District of California, the defendant,

ADEDEJI SHAMONDA,

while acting under color of law, willfully deprived Victim 2 of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable searches and seizures by a person acting under color of law. In so doing, Shamonda unlawfully stopped and restrained Victim 2, and searched Victim 2's person and his belongings.

All in violation of Title 18, United States Code, Section 242.

DATED: June 11, 2024

A TRUE BILL.

/s/ Grand Jury Foreperson
FOREPERSON

ISMAIL J. RAMSEY
United States Attorney

/s/ Michael G. Lagrama
MICHAEL G. LAGRAMA
Assistant United States Attorney

INDICTMENT